

STATE OF VERMONT

SUPERIOR COURT
CHITTENDEN UNIT

Vermont Superior Court

CIVIL DIVISION
Docket No. 385-5-16 cncv

CHARLENE MESSIER,
Plaintiff

v.

UNITED AIRLINES, INC.
Defendant

MAY 09 2016
Fee paid # 231670
Chittenden Unit
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JURY TRIAL DEMANDED

RECEIVED
BURLINGTON, VT

JUN 20 2016
CLERK'S OFFICE
U.S. DISTRICT COURT

COMPLAINT

Plaintiff Charlene Messier, by her attorneys, Gravel & Shea PC, hereby complains of
Defendant and alleges as follows:

Nature of Action

1. This is an action arising out of the failure of Defendant United Airlines, Inc. to properly maintain a jet bridge that it leases at the Burlington International Airport, thereby proximately causing injury to the Plaintiff.

Parties

2. Plaintiff is a resident of Vermont.

3. Defendant United Airlines, Inc. ("United") is a Delaware corporation registered to do business in Vermont. United provides airline flight services at the Burlington International Airport.

Facts

4. On February 20, 2015, Plaintiff walked down a jet bridge at the Burlington International Airport to board a United flight from Burlington to Newark.
5. Defendant had chosen to permit icy conditions to exist on the jet bridge.
6. Plaintiff fell due to the icy conditions and experienced a three-part fracture of the humerus bone in her left arm.
7. Plaintiff suffered damages including, but not limited to, past and future medical expenses, pain and suffering and lost enjoyment of life.

Cause of Action

8. As a common carrier, Defendant United had a duty to passengers such as Plaintiff to exercise utmost care for the safety of its passengers.
9. Defendant breached its duty, thus proximately causing injury and damages to Plaintiff.

Relief Requested

WHEREFORE, Plaintiff prays that judgment be entered in her favor against Defendant for damages as determined by the trier of fact, together with interest, costs, attorneys' fees and such other and further relief as this Court deems just and proper.

Vermont Superior Court

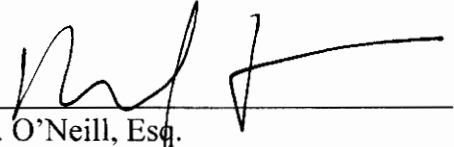
JURY DEMAND

MAY 09 2016

Plaintiff demands trial by jury of all issues so triable.

Chittenden Unit

Dated: Burlington, Vermont
May 5, 2016



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